



111 John Street, Suite 1615, New York, New York 10038

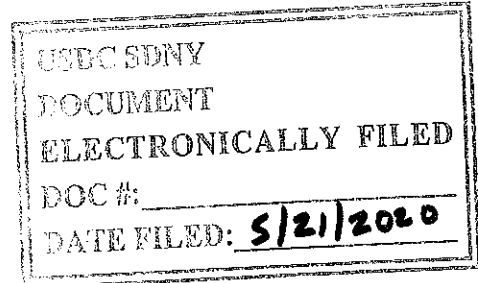
T: (212) 321-0025, F: (212) 321-0024, jpd@mynylawyer.com, www.mynylawyer.com

May 18, 2020

VIA ECF

Hon. Richard M. Berman
United States District Court
500 Pearl St.
New York, NY 10007-1312

Re: USA v. Trojan Hart, 1:15-cr-00288 (RMB)



Your Honor:



I am an attorney duly licensed in the State of New York and admitted to practice law in the United States Federal Court System, Southern District of New York. I am writing to request the Court allow me to file a notice of appearance on Trojan Hart's behalf for the express and limited purpose of filing a motion for his compassionate release and for no other matter.

By way of background, Mr. Hart, who was sentenced in the above referenced case, has his associated appeal pending in the United States Court of Appeals for the Second Circuit (docket number 18-1593). His appeal is being pursued by Bruce R. Bryan, Esq. While he awaits his decision, Mr. Hart (register number 91100-054) is being held at Edgefield Federal Correction Institution in Edgefield, South Carolina. His scheduled release date is March 6, 2028.

As your Honor is aware, COVID-19 (2019 Novel Coronavirus) is affecting people the world over and the scourge is especially dangerous to prisoners who have underlying comorbidities, such as Mr. Hart.

Thank you for your consideration in this matter.

Respectfully submitted,


John Paul DeVerna, Esq.
<u>Mr. DeVerna may file a</u>
<u>notice of appearance.</u>
SO ORDERED:
Date: <u>5/21/2020</u> 
Richard M. Berman, U.S.D.J.

CC: Anden CHOW (By ECF)
Assistant United States Attorney

Kelly Sharkey (By ECF)
Attorney for Defendant